

# Exhibit 3

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

BLACK EMERGENCY RESPONSE TEAM,  
*et al.*,

*Plaintiffs,*

v.

JOHN M. O'CONNOR, *et al.*

*Defendants.*

No. 21-cv-1022-G

**AFFIDAVIT OF JAMES TAYLOR, D. MIN**

I, James Taylor, declare the following:

1. I have a Master's Degree and a Doctorate of Ministry from Andersonville Theological Seminary in Georgia, as well as a Bachelor of Arts in Bible and Ministry from Manhattan Christian College in Kansas. I have served in ministry since 1977, and currently serve as the pastor of Christ Church in Norman.
2. I have authored a number of books and articles throughout my years of ministry, on various social, political, and religious topics.
3. I have also worked as a schoolteacher for about 15 years. From 2013 until very recently, I taught U.S. History, World History, and Social Studies at Roosevelt Middle School for the Oklahoma City Public School system.
4. Despite an exemplary record, I was terminated from Roosevelt on November 3, 2021, in violation of Oklahoma law, SB-658, regarding the wearing of masks in schools. I am part of an ongoing lawsuit against the school district on this ground. Meanwhile, I am actively interviewing for teaching positions for the spring. Several school districts in Oklahoma have expressed an interest in bringing me on as a teacher.

5. I am black. For the past year or two, I have repeatedly spoken in venues across the country against the teaching of critical race theory and related issues, which I strongly believe promote racism, intolerance, and exclusion, often in the name of their opposites (anti-racism, tolerance, and inclusion).
6. To give just one example among many, students in the Buffalo Public Schools in New York have been taught that “all white people play a part in perpetuating systemic racism” and that “often unconsciously, white elites work to perpetuate racism through politics, law, education, and the media.” Buffalo students are also asked to atone for their “white privilege.”<sup>1</sup>
7. I have seen these types of teachings and theories present in Oklahoma City Public Schools. For example, in one mandatory professional development training in 2020 that I attended online, entitled “Back to School 2020: Mental Health in the Dual Pandemics of Covid-19 and Systemic Racism,” we were told that we must publicly acknowledge and confess our white privilege and white racism.
8. I have read House Bill 1775 several times. It doesn’t mention critical race theory by name. Rather, it just speaks to and prohibits the teaching of specific issues of racism and sexism. This is a good thing, since it is the substance that matters and not the labels, which can and are changing. For example, many of the same principles are now coming in under the title of “social and emotional learning.”
9. As an educator, I do not find HB 1775 ambiguous or vague, or broad. Rather, it appears

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<sup>1</sup> Christopher F. Rufo, Failure Factory, City Journal (February 23, 2021), [https://www.city-journal.org/buffalo-public-schools-critical-race-theory-curriculum?mc\\_cid=db0d794439&mc\\_eid=8e7fc145d6](https://www.city-journal.org/buffalo-public-schools-critical-race-theory-curriculum?mc_cid=db0d794439&mc_eid=8e7fc145d6).

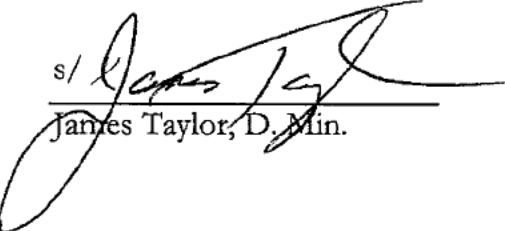
designed to allow teachers to teach broadly, but makes it clear that teachers cannot teach certain specific concepts that would inculcate the idea that one race or sex is superior or inferior. As an opponent of the teaching of critical race theory, in some ways I thought the law was a little too weak. I wish the law was broader, in other words, but I understand its narrowness and support the effort.

10. HB 1775 does not prohibit teaching any history. Teachers can talk about slavery in the South and why they did it, for example, or about the Tulsa Race Riots, or other historical events like that. I have taught about those issues in my classes. HB 1775 tells educators that they just can't blame slavery or the riots on particular individuals because of their skin color, among other things.

11. The law wouldn't hinder me at all from teaching history. It's very easy to comply with.

I state under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 16<sup>th</sup> day of December, 2021, in Oklahoma City, Oklahoma.

s/   
James Taylor, D. Min.